

92 RF 1730

EG&G ROCKY FLATS

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February 28, 1992

92-RF-1730

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DOE, RFO

Attn: F. R. Lockhart

JUSTIFICATION FOR DEFERRING COMPLETION OF THE PHASE II RFI/RI BEDROCK FIELD INVESTIGATION FOR OU 2 - JMK-0139-92

EG&G Rocky Flats, Inc. (EG&G) is requesting that the Department of Energy/Rocky Flats Office (DOE/RFO) request concurrence from the Environmental Protection Agency (EPA) and the Colorado Department of Health (CDH) to defer the Bedrock field program to a later date. As you are aware, due to the shortfall of funds in Fiscal Year 1992 (FY 92), the Phase II RCRA Facilities Investigation/Remedial Investigation (RFI/RI) Bedrock Field Investigation for Operable Unit No. 2 (OU 2) is not funded in Fiscal Year 1992. EG&G informed DOE/RFO of this program impact in November 1991.

During informal discussions between DOE/RFO, EG&G, EPA, and CDH, the potential Environmental Management program impacts due to budget shortages in FY 92 were addressed. Both the financial and technical aspects of a combined Alluvial and Bedrock program for OU 2 were discussed. It became obvious during the discussions that the technical justification for performing both the Alluvial and Bedrock investigations required re-evaluation.

Martin Hestmark from EPA suggested a modified program approach which would first examine the Alluvial data and then assess the data requirements for the Bedrock field program. The original scope of work, as outlined in the Interagency Agreement (IAG) for OU 2, would be amended to reflect this modified approach.

Justification for deferring the Bedrock field program is based on several technical issues. Using Observational Approach guidelines, the immediate implementation of the Bedrock program is premature. Site characterization performed during the Phase II RFI/RI Alluvial field investigation will determine the level of effort necessary for the Bedrock program. After examining the Phase II Alluvial investigation findings, a re-evaluation of the Bedrock program will be necessary.

Early soil data indicate that migration of contaminants from the alluvial sequence to the bedrock sequence is unlikely. This finding is contrary to the original assumptions used in scoping the IAG. Drill core shows the presence of a laterally extensive clay formation

LIST	CTR	CNC
BENJAMIN, A.		
BERMAN, H.S.		
BRETZKE, J.C.		
BURLINGAME, A.H.		
COPP, R.D.		
CRUCHER, D.W.		
DAVIS, J.G.		
DEVERED, J.E.	X	
ERRERA, D.W.		
FRANCIS, G.E.		
GOODWIN, R.		
HANNI, B.J.		
HARMAN, I.K.		
HEALY, T.J.		
DEKEB, E.H.		
HENS, J.P.		
KERSH, J.M.	X	
KIRBY, W.A.		
KUETER, A.W.		
KUERG, D.		
LEE, E.M.	X	
MAJESTIC, J.R.		
MARX, G.E.		
MEURRENS, B.E.		
MORGAN, R.V.	X	
POTTER, G.L.	X	
PIZZUTO, V.M.		
SAFFELL, R.F.		
SANDLIN, N.B.		
SHEPHERD, L.B.		
SWANSON, E.R.		
WIEBE, J.S.		
WILKINSON, R.B.	X	
WILLIAMS, J.M.		
YOUNG, E.R.		
ZANE, J.O.		
Allhoff, F.H.	X	
Kennedy, C.E.	X	
Rhoades, J.L.	X	
Remison, E.A.	X	
Dille, E.A.	X	
Gee, C.B.	X	
Burge, P.S.	X	
EG&G Track'd	X	
CORRES CONTROL	X	X
TRAFFIC		

CLASSIFICATION:

UCNI	
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A-DU02-000295

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By *[Signature]*
Date 5/12/92

R. M. Nelson, Jr.
February 28, 1992
92-RF-1730
Page 2

demonstrating low permeabilities which acts as a barrier to flow. Although these data are preliminary, findings such as these will change the scope of the Bedrock program.

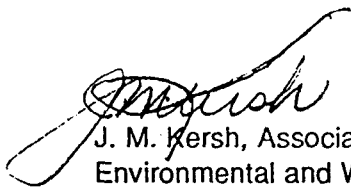
The IAG schedule for OU 2 will be altered by the decision to defer the Bedrock program. In accordance with EPA's suggestion, EG&G proposes to complete a Remedial Investigation (RI) Report based on the Alluvial field investigation. This report will not include any Phase II Bedrock field investigation data. The Alluvial RI Report will be delivered to the regulatory agencies on the date stipulated in the current IAG schedule.

The Alluvial RI report will be the basis for alluvial treatability and feasibility studies. Bedrock will not be considered during these studies.

A subsequent Phase II Bedrock field investigation will be conducted. A second RI report will be written, addressing the Bedrock field investigation findings. Additional treatability and feasibility studies will be performed as needed, based on additional Bedrock investigation data. Finally, a Record-of-Decision (ROD) could be based on separate Alluvial and Bedrock data or based on one final document which incorporates both programs.

DOE and regulatory agency review and approval are paramount in working out the details of the OU 2 schedule. EG&G is anxious to support DOE in any efforts necessary to resolve these issues.

If you have any questions regarding this matter, please contact E. A. Dillé of Remediation Programs at extension 3200.



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EG&G Rocky Flats, Inc.

EAD:dmf

Orig. and 1 cc - R. M. Nelson, Jr.

cc:
S. R. Grace - DOE, RFO